

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE**

KAYLA GORE; L.G.;and K.N.,

Plaintiffs,

v.

WILLIAM BYRON LEE, in his official
capacity as Governor of the State of
Tennessee; and LISA PIERCEY, in her
official capacity as Commissioner of the
Tennessee Department of Health,

Defendants.

No. 3:19-cv-00328

Judge Eli J. Richardson

Magistrate Judge Barbara D. Holmes

DECLARATION OF EDWARD GRAY BISHOP

My name is Edward Gray Bishop, I am over the age of eighteen and competent to testify to the matters set out below based on personal knowledge and experience as the Tennessee State Registrar and the Director of the Division of Vital Records and Statistics, Tennessee Department of Health. Therefore, I declare as follows:

- a. The Tennessee Vital Statistics Birth Data Element Layout used by the Tennessee Department of Health to record information contains over 416 data elements. The information recorded is extensive and ranges from the date of birth to the parents' educational level to the congenital anomalies of the infant.
- b. The information contained in the Tennessee Vital Statistics Birth Data Element Layout forms the basis of the historical birth record of the child, as well as the Tennessee Department of Health Certificate of Live Birth.
- c. Tennessee birth certificates merely record the sex of the child as reported at birth.

- d. Amendments of minor errors on birth certificates during the first year are permitted in accordance with Tenn. Comp. R. & Regs. 1200-07-01-.10(1).
- e. Creating additional ways in which Tennessee's birth records can be modified, particularly without a statutory scheme in place to regulate and track such modifications, heightens the potential for fraud and illegality.

I declare under penalty of perjury that the foregoing is true and correct.

This 14th day of May, 2020.


Edward Gray Bishop